

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
UNITED STATES OF AMERICA	:	
	:	DECLARATION IN SUPPORT
-v.-	:	OF FINAL ORDER OF
	:	<u>FORFEITURE</u>
GERY SHALON,	:	
a/k/a "Garri Shalelashvili,"	:	S1 15 Cr. 333 (LTS)
a/k/a "Gabriel,"	:	
a/k/a "Gabi,"	:	
a/k/a "Phillipe Mousset,"	:	
a/k/a "Christopher Engeham,"	:	
	:	
Defendant.	:	
	:	
-----	X	

Noah D. Solowiejczyk, pursuant to Title 28, United State Code, Section 1746,  
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Damian Williams, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about April 27, 2017, the Court entered a Consent Preliminary Order of Forfeiture (the "First Preliminary Order of Forfeiture") (D.E. 177) with respect to GERY SHALON, a/k/a "Garri Shalelashvili," a/k/a "Gabriel," a/k/a "Gabi," a/k/a "Phillipe Mousset," a/k/a "Christopher Engeham," (the "Defendant"), forfeiting all right, title and interest of the Defendant in the following specific property:

- i. Any and all funds in Account Number LU28 8067 1718 5147 4636, in the name of Leramo Consulting Limited at Ipay International SA, Luxembourg;

- ii. Any and all funds in Account Number CY94002001950000357019221321, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- iii. Any and all funds in Account Number CY44002001950000357019221348, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- iv. Any and all funds in Account Number CY72002001950000357005243241, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- v. Any and all funds in Account Number CY63002001950000357005243306, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vi. Any and all funds in Account Number CY50002001950000357007243001, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vii. Any and all funds in Account Number CY30002001950000357008021398, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- viii. Any and all funds in Account Number CY27002001950000357008021355, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- ix. Any and all funds in Account Number CY61002001950000357009256038, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- x. Any and all funds in Account Number CY8002001950000357008021371, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- xi. Any and all funds in Account Number CY67002001950000357018889582, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- xii. Any and all funds in Account Number CY05002001950000357003552670, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xiii. Any and all funds in Account Number CY40002001950000357003552719, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xiv. Any and all funds in Account Number CY17002003850000004031710806, in the name of Onirama Investments Ltd at Bank of Cyprus, Cyprus;
- xv. Any and all funds in Account CY98002001950000357019220279, in the name Enterprises Limited at Bank of Cyprus, Cyprus;
- xvi. Any and all funds in Account Number 357019220287, in the name of Ringo Enterprises Limited at Bank of Cyprus, Cyprus;
- xvii. Any and all funds in Account Number CY94002001950000357005246143, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;

- xviii. Any and all funds in Account Number CY19002001950000357005246135, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xix. Any and all funds in Account Number CY41002001950000357003666870, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xx. Any and all funds in Account Number 0385-40-115928-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxi. Any and all funds in Account Number 0385-40-187697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxii. Any and all funds in Account Number 0385-40-197285-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiii. Any and all funds in Account Number 0385-40-216697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiv. Any and all funds in Account Number 0385-40-216700-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxv. Any and all funds in Account Number 0385-40-218290-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvi. Any and all funds in Account Number 0385-40-218304-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvii. Any and all funds in Account Number 0385-40-218886-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxviii. Any and all funds in Account Number 0385-40-223510-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxix. Any and all funds in Account Number 0385-40-233737-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxx. Any and all funds in Account Number 0385-40-249706-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxi. Any and all funds in Account Number 0385-40-250534-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxii. Any and all funds in Account Number 0385-40-250542-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;

- xxxiii. Any and all funds in Account Number 0385-42-113003-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxiv. Any and all funds in Account Number 015501209020, in the name of Valentina Popova at Bank of Cyprus, Cyprus;
- xxxv. Any and all funds in Account Number 015540898100, in the name of Valentina Popova at Bank of Cyprus, Cyprus;
- xxxvi. Any and all funds in Account Number GE13BS0000000074236163, in the name of Ideal Seeker Limited at Basis Bank, Georgia;
- xxxvii. Any and all funds in Account Number GE57BS0000000074236147, in the name of Innovative Garden Limited at Basis Bank, Georgia;
- xxxviii. Any and all funds in Account Number GE65CR0000000019953612, in the name of Affare Limited at Cartu Bank, Georgia;
- xxxix. Any and all funds in Account Number GE44CR0000000019953602, in the name of Affare Limited at Cartu Bank, Georgia;
- xl. Any and all funds in Account Number GE10CR0000001957474506, in the name of Affare Limited at Cartu Bank, Georgia;
- xli. Any and all funds in Account Number GE95CR0000005021394516, in the name of Affare Limited at Cartu Bank, Georgia;
- xlii. Any and all funds in Account Number GE79CR0000000014403602, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;
- xliii. Any and all funds in Account Number GE37CR0000002220224516, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;
- xliv. Any and all funds in Account Number GE89CR0000000014203602, in the name of Innovative Garden Limited at Cartu Bank, Georgia;
- xlv. Any and all funds in Account Number GE45CR0000005021424516, in the name of Milos Menkovic at Cartu Bank, Georgia;
- xlvi. Any and all funds in Account Number GE54CR0000005020274516, in the name of Realzone Trading Limited at Cartu Bank, Georgia;
- xlvii. Any and all funds in Account Number GE55CR0000000018763602, in the name of Realzone Trading Limited at Cartu Bank, Georgia;

- xlvi. Any and all funds in Account Number GE76CR0000000018763612, in the name of Realzone Trading Limited at Cartu Bank, Georgia;
- xlix. Any and all funds in Account Number GE93CR0000000019943602, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - l. Any and all funds in Account Number GE17CR0000000019943612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - li. Any and all funds in Account Number GE59CR0000001957464506, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - lii. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - liii. Any and all funds in Account Number GE04CR0000007006864516, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - liv. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - lv. Any and all funds in Account Number GE41CR0000000016133602, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
  - lvi. Any and all funds in Account Number GE05CR0000005020284516, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
  - lvii. Any and all funds in Account Number GE12CR000000000803662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
  - lviii. Any and all funds . in Account Number GE14CR000000000763662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
  - lix. Any and all funds in Account Number GE73CR0000000019373602, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
  - lx. Any and all funds in Account Number GE94CR0000000019373612, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
  - lxi. Any and all funds in Account Number 240-07-457124-01, in the name of Entersa Limited at Hellenic Bank, Cyprus;
  - lxii. Any and all funds in Account Number 240-01-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;
  - lxiii. Any and all funds in Account Number 240-07-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;

- lxiv. Any and all funds in Account Number 240-01-402849-01, in the name of Ilforno Management Limited at Hellenic Bank, Cyprus;
- lxv. Any and all funds in Account Number 240-01-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;
- lxvi. Any and all funds in Account Number 240-07-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;
- lxvii. Any and all funds in Account Number 140-01-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxviii. Any and all funds in Account Number 140-07-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxix. Any and all funds in Account Number 240-07-398091-05, in the name of Telisium Limited at Hellenic Bank, Cyprus;
- lxx. Any and all funds in Account Number 240-07-398091-06, in the name of Telisium Limited at Hellenic Bank, Cyprus;
- lxxi. Any and all funds in Account Number 240-07-555002-01, in the name of Warmkal Trading Limited at Hellenic Bank, Cyprus;
- lxxii. Any and all funds in Account Number LV43LAPB0000026063413, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxiii. Account Number LV16LAPB0000026063414, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxiv. Any and all funds in Account Number LV35LAPB0000066058985, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia;
- lxxv. Any and all funds in Account Number LV53LAPB0000076052668, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia;
- lxxvi. Any and all funds in Account Number 310.051.0010, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxvii. Any and all funds in Account Number 310.051.0002, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxviii. Any and all funds on deposit at Schroder & Co Bank AG, Switzerland in the name of Nener Finance Corp;

- lxxix. Any and all funds in Account Number 310.083.0002, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;
- lxxx. Any and all funds in Account Number 310.083.0010, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;
- lxxxi. \$299,900 in United States currency seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxii. 767,000 in Israeli Shekels seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxiii. Black box containing Mont Blank pen seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxiv. Black purse containing three (3) chains seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxv. Pink box containing fifteen (15) earrings, bracelet, four (4) rings, and Escada button seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxvi. Red box containing gold chain and bracelet seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxvii. Red box containing gold chain seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxviii. Blue box containing a Frank watch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxix. Two red boxes each containing pearl bracelet seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xc. Red box containing a pearl necklace seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xc. Red box containing a pearl necklace with pendant seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;

- xcii. Red box containing a chain and two (2) earrings seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xciii. Magnolia white box containing two (2) earrings, bracelet, ring, pendant, three (3) chains seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xciv. Red box containing large gold chain, flower seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcv. Petek watch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcvi. Chopard wristwatch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcvii. Red box containing a gold chain and three (3) bracelets seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel; and
- xcviii. White MONTBLANC pen seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;

(i. through xcviii., collectively, the “First Preliminary Order Property”);

3. On or about January 8, 2021, this Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the “Second Preliminary Order of Forfeiture”) (D.E.178), which ordered the forfeiture to the United States of, *inter alia*, all right, title and interest of Defendant in the following specific property<sup>1</sup>:

---

<sup>1</sup> The following asset has intentionally not been included in this application for a Final Order of Forfeiture: any and all assets of BigTree Solutions, Inc. and BigTree solutions, LLC, including but not limited to any assets or interests purportedly transferred from BigTree Solutions to DeliverLogic, Inc (the “BigTree Asset”). At this time the Government is not seeking a final order of forfeiture for the BigTree Asset as a third-party, DeliverLogic, Inc., has notified the Government of its potential interest in the BigTree Asset. This Court previously entered a stipulation and order (Dkt. No. 187) that permitted DeliverLogic, Inc. to have up until December 1, 2021 to file with the Court a petition asserting an interest in the BigTree Asset. In that stipulation and order, DeliverLogic, Inc. disclaimed any interest in the remaining Specific Property that the Government



- i. Any and all funds in Account Number CY94002001950000357019221321, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- ii. Any and all funds in Account Number CY44002001950000357019221348, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- iii. Any and all funds in Account Number CY72002001950000357005243241, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- iv. Any and all funds in Account Number CY63002001950000357005243306, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- v. Any and all funds in Account Number CY50002001950000357007243001, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vi. Any and all funds in Account Number CY30002001950000357008021398, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vii. Any and all funds in Account Number CY27002001950000357008021355, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- viii. Any and all funds in Account Number CY61002001950000357009256038, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- ix. Any and all funds in Account Number CY8002001950000357008021371, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- x. Any and all funds in Account Number CY67002001950000357018889582, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- xi. Any and all funds in Account Number CY05002001950000357003552670, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xii. Any and all funds in Account Number CY40002001950000357003552719, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xiii. Any and all funds in Account Number CY17002003850000004031710806, in the name of Onirama Investments Ltd at Bank of Cyprus, Cyprus;
- xiv. Any and all funds in Account Number CY98002001950000357019220279, in the name of Ringo Enterprises Limited at Bank of Cyprus, Cyprus;
- xv. Any and all funds in Account Number 357019220287, in the name of Ringo

---

sought to forfeit and stated that it “shall not file a petition asserting an interest in any of those assets.” (Dkt. No. 187 at 2).

Enterprises Limited at Bank of Cyprus, Cyprus;

- xvi. Any and all funds in Account Number CY94002001950000357005246143, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xvii. Any and all funds in Account Number CY19002001950000357005246135, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xviii. Any and all funds in Account Number CY41002001950000357003666870, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xix. Any and all funds in Account Number 0385-40-115928-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xx. Any and all funds in Account Number 0385-40-187697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxi. Any and all funds in Account Number 0385-40-197285-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxii. Any and all funds in Account Number 0385-40-216697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiii. Any and all funds in Account Number 0385-40-216700-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiv. Any and all funds in Account Number 0385-40-218290-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxv. Any and all funds in Account Number 0385-40-218304-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvi. Any and all funds in Account Number 0385-40-218886-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvii. Any and all funds in Account Number 0385-40-223510-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxviii. Any and all funds in Account Number 0385-40-233737-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxix. Any and all funds in Account Number 0385-40-249706-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxx. Any and all funds in Account Number 0385-40-250534-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxi. Any and all funds in Account Number 0385-40-250542-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;

- |          |   |
|----------|---|
| xxxii.   | Any and all funds in Account Number 0385-42-113003-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus; |
| xxxiii.  | Any and all funds in Account Number 015501209020, in the name of Valentina Popova at Bank of Cyprus, Cyprus;                    |
| xxxiv.   | Any and all funds in Account Number 015540898100, in the name of Valentina Popova at Bank of Cyprus, Cyprus;                    |
| xxxv.    | Any and all funds in Account Number GE13BS00000000074236163, in the name of Ideal Seeker Limited at Basis Bank, Georgia;        |
| xxxvi.   | Any and all funds in Account Number GE57BS00000000074236147, in the name of Innovative Garden Limited at Basis Bank, Georgia;   |
| xxxvii.  | Any and all funds in Account Number GE65CR00000000019953612, in the name of Affare Limited at Cartu Bank, Georgia;              |
| xxxviii. | Any and all funds in Account Number GE44CR00000000019953602, in the name of Affare Limited at Cartu Bank, Georgia;              |
| xxxix.   | Any and all funds in Account Number GE10CR00000001957474506, in the name of Affare Limited at Cartu Bank, Georgia;              |
| xl.      | Any and all funds in Account Number GE95CR00000005021394516, in the name of Affare Limited at Cartu Bank, Georgia;              |
| xli.     | Any and all funds in Account Number GE79CR00000000014403602, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;        |
| xl ii.   | Any and all funds in Account Number GE37CR00000002220224516, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;        |
| xl iii.  | Any and all funds in Account Number GE89CR00000000014203602, in the name of Innovative Garden Limited at Cartu Bank, Georgia;   |
| xl iv.   | Any and all funds in Account Number GE45CR00000005021424516, in the name of Milos Menkovic at Cartu Bank, Georgia;              |
| xl v.    | Any and all funds in Account Number GE54CR00000005020274516, in the name of Realzone Trading Limited at Cartu Bank, Georgia;    |
| xl vi.   | Any and all funds in Account Number GE55CR00000000018763602, in the name of Realzone Trading Limited at Cartu Bank, Georgia;    |
| xl vii.  | Any and all funds in Account Number GE76CR00000000018763612, in the name of Realzone Trading Limited at Cartu Bank, Georgia;    |
| xl viii. | Any and all funds in Account Number GE93CR00000000019943602, in the   |

- name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- xlix. Any and all funds in Account Number GE17CR0000000019943612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
    - 1. Any and all funds in Account Number GE59CR00000001957464506, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia
    - li. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
    - lii. Any and all funds in Account Number GE04CR00000007006864516, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
    - liii. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
    - liv. Any and all funds in Account Number GE41CR0000000016133602, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
    - lv. Any and all funds in Account Number GE05CR00000005020284516, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
    - lvi. Any and all funds in Account Number GE12CR0000000000803662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
    - lvii. Any and all funds in Account Number GE14CR0000000000763662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
    - lviii. Any and all funds in Account Number GE73CR0000000019373602, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
    - lix. Any and all funds in Account Number GE94CR0000000019373612, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
    - lx. Any and all funds in Account Number 240-07-457124-01, in the name of Entersa Limited at Hellenic Bank, Cyprus;
    - lxi. Any and all funds in Account Number 240-01-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;
    - lxii. Any and all funds in Account Number 240-07-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;
    - lxiii. Any and all funds in Account Number 240-01-402849-01, in the name of Ilforno Management Limited at Hellenic Bank, Cyprus;
    - lxiv. Any and all funds in Account Number 240-01-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;

- lxv. Any and all funds in Account Number 240-07-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;
- lxvi. Any and all funds in Account Number 140-01-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxvii. Any and all funds in Account Number 140-07-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxviii. Any and all funds in Account Number 240-07-398091-05, in the name of Telisium Limited at Hellenic Bank, Cyprus;
- lxix. Any and all funds in Account Number 240-07-398091-06, in the name of Telisium Limited at Hellenic Bank, Cyprus;
- lxx. Any and all funds in Account Number 240-07-555002-01, in the name of Warmkal Trading Limited at Hellenic Bank, Cyprus;
- lxxi. Any and all funds in Account Number LV43LAPB0000026063413, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxii. Account Number LV16LAPB0000026063414, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxiii. Any and all funds in Account Number LV35LAPB0000066058985, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia;
- lxxiv. Any and all funds in Account Number LV53LAPB0000076052668, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia;
- lxxv. Any and all funds in Account Number 310.051.0010, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxvi. Any and all funds in Account Number 310.051.0002, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxvii. Any and all funds in Account Number 310.083.0002, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;
- lxxviii. Any and all funds in Account Number 310.083.0010, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;
- lxxix. Any and all funds in Account Number GE60CR0000000936273611 in the name of Gery Shalelashvili at JSC Cartu Bank;
- lxxx. Any and all funds in Account Number GE57CR0000005021184516 in the name of Gery Shalelashvili at JSC Cartu Bank;
- lxxxi. Any and all funds in Account Number GE16CR000000019963612 in the name

of Option Ground Ltd at JSC Cartu Bank

- lxxxii. Any and all funds in Account Number GE46CR0000005021404516 in the name of Option Ground Ltd at JSC Cartu Bank;
- lxxxiii. Any and all funds in Account Number GE25CR0000007017114516 in the name of Option Ground Ltd at JSC Cartu Bank;
- lxxxiv. Any and all funds in Account Number GE84CR000000001663612 in the name of Aliner Ltd at JSC Cartu Bank;
- lxxxv. Any and all funds in Account Number GE82CR0000002220294516 in the name of Aliner Ltd at JSC Cartu Bank
- lxxxvi. Any and all funds in Account Number GE45CR0000000019383612 in the name of Direct Finance Ltd at JSC Cartu Bank;
- lxxxvii. Any and all funds in Account Number GE78CR0000000077893612 in the name of Direct Finance Ltd at JSC Cartu Bank;
- lxxxviii. Any and all funds in Account Number GE25CR0000000019383602 in the name of Direct Finance Ltd at JSC Cartu Bank;
- lxxxix. Any and all funds in Account Number GE50CR0000000435413612 in the name of BET Services, N.V. at JSC Cartu Bank;
  - xc. Any and all funds in Account Number GE85CR0000002220234516 in the name of BET Services, N.V. at JSC Cartu Bank;
  - xc. Any and all funds in Account Number GE69CR0000000015993612 in the name of Kontur LP at JSC Cartu Bank;
  - xcii. Any and all funds in Account Number GE41CR0000000015583612 in the name of Artset Company Corp at JSC Cartu Bank;
  - xciii. Any and all funds in Account Number GE84CR0000002220254516 in the name of Artset Company Corp at JSC Cartu Bank;
  - xciv. Any and all funds in Account Number GE07CR0000000011963602 in the name of Themo Business Ltd at JSC Cartu Bank;
  - xcv. Any and all funds in Account Number GE56CR0000000011953603 in the name of Dyna International Holding Ltd at JSC Cartu Bank;
  - xcvi. Any and all funds in Account Number GE98TB7773045164400001 in the name of Gery Shalelashvili at JSC TBC Bank;
  - xcvii. Any and all funds in Account Number GE45TB707730366100014 in the name of Gery Shalelashvili at JSC TBC Bank;

- xcviii. Any and all funds in Account Number GE27TB727264561700001 in the name of Robert Shalelashvili at JSC TBC Bank;
- xcix. Any and all funds in Account Number GE89VT6600000008623602 in the name of Aliner Ltd at JSC VTB Bank;
  - c. Any and all funds in Account Number GE41VT6600000008613602 in the name of Kontur LP at JSC VTB Bank;
  - ci. 202.45 Bitcoin seized by the Federal Bureau of Investigation on or about September 26, 2016 from a digital wallet with the public address ending in y2Bx;
  - cii. Any and all assets of Nener Finance Corp.;
  - ciii. \$74,745,279.29 in United States currency formerly on deposit at Schroder & Co Bank AG, Switzerland, in the name of Nener Finance Corp., seized by the Government on or about October 9, 2018;
  - civ. \$459,415.79 in United States currency formerly on deposit in in Account Number LU28 8067 1718 5147 4636, in the name of Leramo Consulting Limited at Ipay International SA, Luxembourg, seized by the Government on or about March 5, 2018; and
  - cv. The following specific property seized by the Israeli Government on or about July 21, 2015 from the Defendant's residence:
    - a. An OTP device in a police envelope
    - b. Transcend CompactFlash 32 GB
    - c. Envelope containing two SIM cards
    - d. Seven SIM cards
    - e. Seized item of electronic equipment (Seizure No. 1152227, Item No.77606159
    - f. A white cardboard package that says 9342 (Seizure No. 115227, Item No. 77606157)
    - g. RSA SecureID
    - h. OTP RSA SecureID
    - i. DOK
    - j. DOK Sandisk cruzer micro
    - k. DOK TDK
    - l. DOK Sandisk Titanium
    - m. DOK 2G
    - n. PHILIPS recording device
    - o. Hard Disk External WD Black + USB Cable
    - p. HTC D626ph
    - q. LG-E960 nexus
    - r. Porsche Design Portable External Disk, Ran P. 38 and USB Cable
    - s. iPhone 6

- t. Laptop Asus R510L Silver Gray and MSI Black gray bag + charger
- u. Black iPhone 5s
- v. Samsung Note Black, SIM and memory card
- w. Hard Disk Lacie orange
- x. Macbook Pro
- y. Laptop Asus Eee
- z. Macbook Air Silver
- aa. 1,867,582 NIS deposited into a forfeiture fund representing \$299,900 in United States currency and 767,000 NIS seized by the Israeli Government on or about July 21, 2015 from the Defendant's residence

(i. through cv., collectively, the “Second Preliminary Order Property”) (the “First Preliminary Order Property” and the “Second Preliminary Order Property,” collectively, the “Specific Property”).

4. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on April 19, 2021 for thirty (30) consecutive days, through May 18, 2021, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court November 15, 2021 (D.E. 209).

5. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property have been filed.

6. The Defendant is the only person and/or entity known by the Government to have a potential interest in the Specific Property.

7. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.


[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]



8. No previous application for the relief requested herein has been sought.

Dated: New York, New York  
November 15, 2021

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By:   
\_\_\_\_\_  
Noah D. Solowiejczyk  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
(212) 637-2473